

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION**

MDL No. 16-2738
Hon. Freda L. Wolfson
Magistrate Judge Lois H. Goodman

Case No.: 3:16-md-02738-FLW-LHG

[ORAL ARGUMENT REQUESTED]

**THE FERRARO LAW FIRM, P.A.’S MOTION FOR RELIEF FROM
COMMON BENEFIT FEE ASSESSMENTS**

PLEASE TAKE NOTICE that on January 3, 2022, or at such other time as set by the Court, The Ferraro Law Firm, P.A. (hereafter, “Ferraro Law”) on behalf of the Plaintiffs it represents (including as identified in Exhibit B filed simultaneously herewith), will move for relief from common benefit fee assessments pursuant to Case Management Order No. 7(A) and the Common Benefit Participation Agreement Ferraro Law executed.

PLEASE TAKE FURTHER NOTICE that Ferraro Law shall rely upon the Memorandum of Law filed as **Exhibit A** herewith in support of the relief sought in its Motion, and the exhibits thereto.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

PLEASE TAKE FURTHER NOTICE that no brief is being filed herewith because the legal basis upon which relief should be granted is set forth in the Memorandum of Law.

PLEASE TAKE FURTHER NOTICE that responses or oppositions, if any, must be electronically filed and served by December 20, 2021.

Dated: December 10, 2021

Respectfully submitted,

s/ David A. Jagolinzer

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CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of December, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which sent notification of such filing to all counsel of record. Consistent with Rule 7.1(g) of the Local Rules of the United States District Court for the District of New Jersey, Ferraro Law will forward a file-stamped courtesy copy of this filing to the Court.

s/ David A. Jagolinzer
David A. Jagolinzer